

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

**NOTICE OF MOTION TO SUPPRESS EVIDENCE OBTAINED THROUGH SEARCH
WARRANTS, OR IN THE ALTERNATIVE, FOR A *FRANKS* HEARING**

PLEASE TAKE NOTICE THAT, upon the Declaration of Teny Geragos, Esq., dated February, 18, 2025, the exhibits attached thereto, and the accompanying Memorandum of Law, defendant Sean Combs, by and through his undersigned attorneys, will move this Court at the United States Courthouse, 500 Pearl Street, New York, N.Y., 10007 at a date and time to be determined by the Court, for an Order (1) suppressing the evidence and all fruits obtained from the following search warrants: (a) the January 4, 2024 warrant to search Mr. Combs's iCloud accounts; (b) the March 22, 2024 warrant to search his Los Angeles residence, and to seize evidence obtained therein; (c) the March 22, 2024 warrant to search his Miami residence, and to seize evidence obtained therein; (d) the March 25, 2024 warrant to search his person, and to seize and search two of his cellular phones, referred to by the government as Combs Number-1 and Combs Number-2, and to extract information from those phones; (e) the September 16, 2024 warrant to search his person, and to seize and search an additional two of his cellular phones, referred to by the government as Combs Number-3 and Combs Number-4, and to extract information from those phones; and (f) the September 16, 2024 warrant to search Combs's room at the Park Hyatt hotel and to seize evidence obtained therein; or (2) in the alternative, granting a *Franks* hearing.

Date: February 18, 2025

Respectfully Submitted,

/s/Alexandra A.E. Shapiro

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